

**EXHIBIT F**

**EXHIBIT "F"**

The individual set forth below may testify based on experience, qualification and inspection of the ACM in the building, or bulk samples of same, regarding those matters set forth in Paragraph Roman Numerals I and II and with regard to the condition of the material and the presence or absence of asbestos contamination in the building at this time, or historically and/or the likelihood of such in the future, due to such Grace ACM material. Such witnesses may refer to any document including asbestos inspection reports or surveys which were produced or filed in connection with the proof of claim forms.

1. **William M. Ewing.** Mr. Ewing is the Technical Director of Compass Environmental, Inc., 1751 McCollum Parkway, Kennesaw, Georgia 30144 and a Certified Industrial Hygienist (CIH). Mr. Ewing received a Bachelor of Science in Biology from Washington and Lee University and in 1978, began work at Clayton Environmental Consultants, Inc. in the field of industrial hygiene. In 1981, he joined the Georgia Tech Research Institute starting its industrial hygiene laboratory and instituting the hazardous waste program for small business in Georgia. He was director of the EPA-sponsored Asbestos Information Center and served as an industrial hygienist under the 7(c) (1) Program, sponsored by the Occupational Safety and Health Administration (OSHA). In 1983, Mr. Ewing became board certified in the comprehensive practice of industrial hygiene. In 1987, he left the Georgia Tech Research Institute to take the position of Executive Vice President at the Environmental Management Group, Inc. In 1990, Diagnostic Engineering, Inc. acquired Environmental Management Group, Inc. and employed Mr. Ewing as Regional Technical Director until 1993 when he joined the consulting firm of Compass Environmental Inc.

During his career Mr. Ewing has conducted numerous industrial hygiene, asbestos management and environmental studies. He has authored several publications and served on many committees, including governmental and industrial committees, to study subjects, including methods for the identification of asbestos in buildings, disposal of ACM, evaluation of ACM, procedures for the abatement or containment of ACM in buildings, and measurement of asbestos fiber levels. Mr. Ewing has also conducted asbestos surveys for asbestos management and control in commercial and governmental facilities, including commercial office buildings, schools, hospitals, ships, industrial plants and government buildings. He has frequently directed or lectured in training courses sponsored by universities, government agencies and private interests on topics, including respiratory protection, asbestos identification, evaluation, management and control, and industrial hygiene. Mr. Ewing has provided asbestos-related consulting services to property managers and building owners throughout the nation.

Mr. Ewing has over 24 years experience evaluating asbestos in buildings in 42 states. He has conducted over 2,500 building inspections and designed asbestos abatement projects for over 100 buildings. He is accredited as an Asbestos Inspector, Asbestos Management Planner, Asbestos Abatement Project Supervisor, and an Asbestos Abatement Project Designer pursuant to the EPA regulations. Mr. Ewing was formerly Director of the EPA-sponsored Asbestos Information Center at the Georgia Tech Research Institute. The primary mission of the center was to conduct training, research and provide technical assistance regarding asbestos in buildings. In 1984 and 1985, he served as Chair of the Governor's Conference on asbestos.

Mr. Ewing was invited to testify before OSHA regarding proposed changes to its asbestos regulations in 1984. He was invited by the EPA's Asbestos Action Program to serve as a technical advisor to the Regulatory Negotiation Committee for writing the Asbestos Hazard

Emergency Response Act regulations in 1986-87. He was invited to participate in the Congressionally-mandated evaluation of asbestos in schools in the early 1990s. He has served on numerous advisory panels and peer review committees addressing asbestos-related topics. These panels were sponsored by the EPA, the National Institute for Occupational Safety and Health (NIOSH), the US Navy (Shore Facilities Command), Army Corps of Engineers, General Services Administration, City of New York, Health Effects Institute, and the National Institute of Building Sciences. He served as the invited external reviewer for the EPA asbestos NESHAP revisions.

Mr. Ewing has published 19 articles on topics related to asbestos evaluation and control in buildings and given over 50 presentations or papers on the subject at conferences or symposia. In recognition of his professional contributions, he was designated a Fellow by the American Industrial Hygiene Association in 1995. In 2002, he was invited to a presentation at an ASTM conference on the subject of vermiculite mining in Libby, Montana.

As a result of his education, training and experience, Mr. Ewing is qualified to offer expert opinions related to asbestos-in-building issues including, but not limited to the following: evaluation and assessment of ACM in buildings and including their friability, including the primary assessment tools to determine fiber release and/or the need for corrective action; air, dust and bulk sampling techniques, their scientific acceptance, and their reliability and use to measure asbestos contamination; the contamination resulting from ACM in buildings; guidelines and regulations issued by EPA, OSHA, the Consumer Product Safety Commission (CPSC) and other agencies relating to asbestos. He may testify regarding contamination as measured by air or dust sampling resulting from simulations of routine and/or foreseeable activities in buildings with in-place ACM. He may testify regarding disturbance and/or re-entrainment of asbestos

from settled surface dust, and the attendant air levels as determined by various methods of testing. He may testify regarding the background levels of asbestos as determined in settled surface dust sampling. Further, Mr. Ewing may also testify as an expert consistent with or similar in substance to that testimony given in previous property damage asbestos cases prosecuted by Martin Dies, Edward Westbrook and Dan Speights on behalf of PD claimants.

2. **William Longo, Ph.D.** See Exhibit "A" for witness' statement of qualifications and experience.

3. **Kenneth L. Pigg.** See Exhibit "C" for witness' statement of qualifications and experience.

4. **John C. Mertian.** See Exhibit "C" for witness' statement of qualifications and experience.

5. **Thomas F. Manning.** See Exhibit "C" for witness' statement of qualifications and experience.

6. **Wade Anderson.** See Exhibit "C" for witness' statement of qualifications and experience.

7. **Martin Bennett.** Mr. Bennett is a Senior Consultant for Materials Analytical Services, Inc. (MAS) at their corporate headquarters in Suwanee, Georgia. Mr. Bennett performs/ manages and serves as the technical lead on broad array of environmental projects. Over the past 9 years, he has focused primarily on serving the commercial and industrial real estate market. Mr. Bennett is responsible for certain aspects of asbestos assessment, chemical and microanalytical testing, as well as technical review for asbestos and IAQ related work company wide. Prior to joining MAS, Mr. Bennett served as an Environmental Consultant with MACTEC Engineering and Consulting Services, Inc. in Atlanta. His areas of expertise included:

Regulatory Compliance, Phase I and Phase I Assessments, Soil and Groundwater Remediation, Underground Storage Tanks, Environmental Risk Assessment, Industrial Hygiene (including IAQ, Asbestos, LBP, Radon, EMFs, Hazardous Materials and Mold). Prior to that, Mr. Bennett served as acting Chief Engineer for the North East region of MACTEC, which was primarily devoted to serving the asbestos industry. He was instrumental in the establishment of the New York City office, as well as the technical supervision of a 40 person staff. Prior to MACTEC, he served 3½ years with McCrone Environmental (a pioneer in the microanalytical field). Mr. Bennett has a cumulative experience of over 19 years in the environmental field, which encompasses projects performed throughout the United States, Canada, South America, Central America and the Caribbean. His strengths are in project management, emergency response, assessment of building hazards and design of analytical testing strategies.

Mr. Bennett has performed well over 300 Phase I environmental site assessments in accordance with ASTM standards. Typical properties assessed include high-rise office buildings, shopping centers, apartment complexes, industrial plants and undeveloped land. In the course of this work, Mr. Bennett routinely conducts Phase II assessments (involving sub surface drilling, monitoring well installation, soil/groundwater sampling and interpretation of analytical results). This type of Phase II work is performed at properties where conditions warrant a quantification or delineation of the potential hazards found there. Contaminants typically assessed include metals, hydrocarbons, solvents, pesticides and PCBs. In addition, Mr. Bennett possesses a broad knowledge of environmental regulations and issues in the areas of soil/groundwater contamination and underground storage tanks (USTs). Mr. Bennett has also co-authored a nationally published book *Hazardous Substances in Buildings: Liability, Litigation and Abatement*, which address asbestos, lead, polychlorinated biphenyls (PCBs), formaldehyde

and radon. Relative to industrial and manufacturing operations, Mr. Bennett has conducted numerous compliance audits in preparation of plant closings, real estate transfers and regulatory actions. In this capacity, he has prepared and submitted regulatory compliance documentation to responsible agencies, including air permits, Tier II and Form R reporting, spill prevention, containment and countermeasure plans (SPCC), storm water pollution prevention plans (SWPPP), and development of Best Management Practices Plans for storm water and hazardous waste concerns. In addition possesses a broad knowledge of Process Safety Management.

Mr. Bennett routinely performs a variety of air, surface and subsurface contamination assessments, hydrogeologic assessments, and underground storage tank consulting services. He is experienced in the installation of groundwater monitoring and recovery wells and the use of groundwater and soil vapor monitoring equipment. In projects where MACTEC has acted as the general contractor, he has prepared contract documents and bid packages, prepared work and safety plans, supervised the removal of underground storage tanks and managed soil/water remediation efforts. Mr. Bennett has prepared Corrective Action Plans involving the assessment of dissolved and free phase contaminant plumes, soil and rock conditions, aquifer characteristics, groundwater flow rates, and the design of soil remediation operations. He is familiar with groundwater and soil sampling protocols, well installation, soil boring and rock coring, OSHA safety regulations, and hazardous waste management. Mr. Bennett is also familiar with state and federal regulations governing water and soil contaminants, UST and AST management, and has acted as project manager for remediation and UST closure projects. Many of these projects have required coordination with various subcontractors and state & federal agencies. In the preparation of Corrective Action Plans, Mr. Bennett has prepared cost estimates for construction efforts involving paving, soil excavation and excavation bracing, groundwater and soil remediation

scenarios and component construction, and equipment procurement. Additionally, Mr. Bennett has extensive experience with Georgia's Hazardous Site Response Act (HSRA). He has performed and managed numerous HSRA assessments, notifications and corrective actions and is familiar with the reportable quantity screening method (RQSM) of scoring sites with identified releases to soil and/or groundwater. Mr. Bennett is also familiar with the HSRA risk reductions standards and has assisted in the preparation of Compliance Status Reports (CSR).

As a consultant in the asbestos field, Mr. Bennett has had extensive experience in performing and managing surveys and hazard assessments for asbestos-containing materials (ACM) in variety of building structures ranging from private homes to state and nationwide real estate holdings of municipalities and Fortune 500 companies. His expertise in identification of ACM is based on experience of conducting over 600 surveys and possessing the micro analytical training and credentials to perform the actual bulk sample analysis. Mr. Bennett's survey experience has been called upon in numerous asbestos litigation trials to evaluate the condition of the ACM found in a building as well as the extent of asbestos contamination and occupant exposure potential. Mr. Bennett has been actively involved for over 10 years in asbestos product-identification through the process of chemical and micro-analytical constituent analysis. In addition he possess a thorough understanding of the analytical methodologies specific for asbestos hazard assessments including the NIOSH 7400 Method for Phase Contrast Microscopy (PCM), the EPA Method for Polarized Light Microscopy (PLM), the EPA method for Transmission Electron Microscopy (TEM), as well as the EPA and ASTM draft micro-vac methods for dust sample analysis. Mr. Bennett, is also a qualified instructor of the NIOSH Course NO. 582 "Sampling and Evaluating Airborne Asbestos Dust" and has played a significant role in the analytical assessment area by his contributions to a standardized dust sampling and

fall out sampling protocols. Mr. Bennett has technical experience in lead-based paint inspection and abatement consulting services. His inspection experience has included the supervision of XRF technicians, review of laboratory results, and developing risk assessments for multi-family housing developments. He has inspected, managed, and monitored lead-based paint and lead dust removal projects at military bases and historic buildings. His abatement experience has included development of removal specifications and O&M plans, waste testing, handling, and disposal requirements, lead contaminated soil testing and remediation, exposure monitoring, and clearance wipe sampling. In the area of asbestos project design and management, Mr. Bennett has developed complete asbestos abatement specifications and designed site specific operation and maintenance (O&M) plans for numerous facilities. In addition he has served as a project manager and owners representative on several hundred asbestos abatement projects ranging from small-scale weekend projects to those over 2 million square feet in area. In this capacity his duties have included maintenance and building staff training, air sampling, project observation and documentation, development of work procedures and contract administration.

Mr. Bennett manages the industrial hygiene, indoor air quality and fungal assessment section of the Facilities Environmental section of the Atlanta Branch. In this capacity, Mr. Bennett has performed and managed numerous industrial hygiene projects including indoor air quality (IAQ) surveys, mold/airborne pathogen assessments, noise level surveys, electro-magnetic field assessments, industrial ventilation testing, confined space entry, respiratory protection training, employee exposure monitoring, waste testing and handling procedures, hazard communication and site health and safety issues. His IAQ services have included building evaluations, interviews, and testing to assess occupant complaints and sick building syndrome (SBS). He has performed both commercial and industrial assessments of indoor air quality utilizing specific gas and multi-gas

direct reading instruments for chemical contaminant sampling, particulate sampling and microbial bulk and air sampling. Typical assessments combine water infiltration evaluations and HVAC system surveys with contaminant test results to develop conclusions and recommendations on building air quality. Typical projects include assessments, O&M program development and oversight of remediation for universities, commercial office buildings and industrial plants. Mr. Bennett's experience and expertise are frequently called upon in industry training seminars and testing and inspections services for law firms and insurance companies for IAQ /mold litigation related claims.

Examples of his project experience include:

**World Trade Center Disaster, New York, NY.** Multi-discipline emergency response following collapse of the World Trade Center (WTC). Efforts directed at collateral damage sustained to facilities owned and occupied by major New York City banking institution. Technical lead for industrial hygiene and engineering support to assess, design, coordinate and remediate environmental impacts at 3 major facilities (in excess of 5 million square feet) at or near ground zero. Eighteen month effort addressed metals, VOCs, dioxins, asbestos, mold and drinking water. Total remediation and restoration fees in excess of \$250 million. Efforts included coordination with federal investigators, federal and state environment regulators, the mayor's office and over 15 separate trades and unions.

**Atlantic Steel / National Lead Superfund Site, Atlanta, GA.** Environmental and engineering support for initial investigation of lead impacts to soils in a residential community. Investigation conducted in response to surface deposition of lead allegedly resulting from the historic airborne emissions released at two former industrial sites. Developed and conducted sampling protocols and testing strategies (both in-situ and ex-situ) for determination of lead

contamination. Coordinated efforts directly with representatives of both PRPs, the developer and EPA region 4. Responsible for initial development of remediation/restoration plan and exit strategy.

**Coca-Cola ESA/Compliance Audits, Brazil.** Industrial compliance audit and environmental assessment at 26 bottling plants and support facilities in 15 States of Brazil. Efforts included review of applicable state and federal environmental regulations, evaluation of existing wastewater treatment systems, assessment of UST and AST systems, air permitting issues and hazardous waste storage and disposal. Reports prepared for client to assess facilities compliance with in-house polices, global standards and federal regulations.

**Space Master Multi-Site Portfolio, 26 States, USA.** Environmental assessment /due diligence for a 52 site \$200 million commercial business. Directed Phase I and Phase II assessments at each site relative to guidelines prepared jointly for the seller and the buyer. Provided technical review of all reports and prepared uniform conclusions and recommendations relative to on-site hazards. Entire project completed successfully with in an accelerated 60-day close schedule.

**City of Baltimore Asbestos Litigation, Baltimore, MD.** Hazard assessment and expert witness testimony in successful \$100 Million asbestos property damage claim. Case involved the inspection; hazard assessment and asbestos product identification in over 60, City of Baltimore owned facilities. Ultimately the case was tried over a 3-year period in three separate trials, against asbestos manufacturers, which Mr. Bennett provided pivotal testimony leading to successful jury decisions in each. Responsible for all micro-analytical aspects of the case including testing protocols, interpretation of data and development of test studies.

**Dupont Plaza Hotel Fire, San Juan, Puerto Rico.** Industrial hygiene and engineering support following an intentionally set fire at the hotel. Directed environmental monitoring and contamination assessment relative to asbestos and other environmental hazards caused as a result of the fire. Responsible for emergency response health/safety training and respiratory protection for state and federal investigators. Prepared assessment reports and briefings for insurance carriers, OSHA, EPA and local regulators. Developed and coordinated initial remediation plans to facilitate long term investigation of crime scene.

8. **Jim Boden.** Mr. Boden is also listed in Exhibit "B" as a fact witness and as Claimant Representative for EPEC Realty. Mr. Boden is an EPA certified licensed building inspector. From 1997 until recently Mr. Boden was Manager, Facility Operations for El Paso Energy Corporation. Mr. Boden may testify regarding the history of the Grace fireproofing ACM in the El Paso Energy Building, including efforts to manage and/or maintain the ACM in place, including operations and maintenance procedures, testing, monitoring and other related actions. He may testify concerning the condition of the ACM, contamination or lack thereof and the unique aspects of the buildings design and/or construction that may bear on such issues. He was the representative responsible for coordinating with representatives of Grace who inspected the Grace fireproofing and conducted the DMA field test on the Grace fireproofing ACM in June 1998. Mr. Boden may testify regarding his knowledge of the DMA field trial and his opinions regarding such field test. He may testify regarding conversations he had with Grace representatives, their inspection of the ACM prior to beginning such field trial, and his opinions regarding the selection of the ACM for the DMA field test, and its suitability.

9. **Kommy M. Azarpour, P.E.** Mr. Azarpour is an Engineer Principal of Environmental Resource Consultants (E.R.C.) located at 9800 Northwest Freeway, Suite 610, Houston, Texas 77092. Mr. Azarpour is an EPA certified licensed Asbestos building Inspector/Management Planner and has experience in management, monitoring and inspection related to environmental issues including asbestos in buildings. Mr. Azarpour and E.R.C. have performed various asbestos and environmental related services for EPEC Realty and/or El Paso Energy. E.R.C. has performed periodic monitoring for asbestos at the El Paso Energy Building and inspections and consulting services related to the fireproofing ACM. In approximately June 1998, E.R.C. was retained by EPEC and/or El Paso Energy to provide project oversight, management, monitoring and inspection services during applications of W.R. Grace DMA product on the Grace fireproofing ACM in the El Paso Energy Building. Mr. Azarpour may testify regarding the consulting, inspection and testing performed by E.R.C. on the Grace fireproofing ACM in the El Paso Energy Building including his related opinions thereof including but not limited to the condition of the ACM, efforts to manage the ACM in place, operations and maintenance aspects of the building design and/or construction which may affect the maintenance of the ACM other related issues. He may also testify concerning his project oversight, monitoring, and/or inspection regarding the DMA field test performed by Grace and his opinions with regard to such field test including Grace's selection of the ACM for the field test and its suitability. He may testify regarding his conversation with Grace both on site and at the DMA seminar in Las Vegas, Nevada. He may offer opinions regarding the DMA and the Grace ACM.